

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHAEL WATSON, INDIVIDUALLY,  
AND AS FATHER AND NEXT FRIEND  
OF JOHN WATSON, PPA  
Plaintiff

v.

ELECTROLUX PROFESSIONAL  
OUTDOOR PRODUCTS, INC.  
Defendant

CIVIL ACTION NO. 04-11782 DPW

**DEFENDANT'S MOTION FOR LEAVE TO FILE REPLY MEMORANDUM  
IN SUPPORT OF MOTION TO PRECLUDE EXPERT TESTIMONY  
AND FOR SUMMARY JUDGMENT**

In his response to Electrolux's motion to preclude the testimony of his liability expert and for summary judgment, plaintiff Michael Watson mischaracterizes, in several respects, the record evidence that is material to a proper determination of the motion. These mischaracterizations—as to what the record in fact shows, and how the evidence does or does not pertain to the issues raised by Electrolux's motion—appear in Watson's opposition memorandum, in his response to Electrolux's statement of undisputed material facts, and in Watson's "Additional Statement of Material Facts."

In order to provide the Court with a complete and accurate view of the record as it bears on Electrolux's motion, Electrolux requests leave, pursuant to LR. 7.1(B)(3), to file the brief Reply Memorandum submitted herewith.

ELECTROLUX PROFESSIONAL OUTDOOR  
PRODUCTS, INC.,  
By its Attorneys,

/s/ David A. Barry

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DATED: June 16, 2006

CERTIFICATE OF SERVICE

I, David A. Barry, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 16, 2006.

/s/ David A. Barry

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